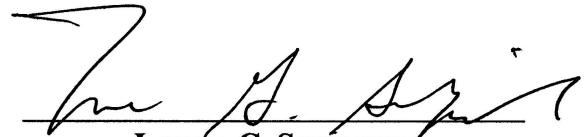


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----		X	
DOMINICK VOLINO, ET AL.,	:	:	
Plaintiffs,	:	:	
	:	:	21 Civ. 6243 (LGS)
-against-	:	:	
PROGRESSIVE CASUALTY INSURANCE	:	:	Application GRANTED nunc pro tunc. The Parties shall
COMPANY, ET AL.,	:	:	submit their proposed class notice plan by April 14,
Defendants.	:	:	2023. No further extension will be granted absent
	:	:	compelling circumstances.
-----		X	
MICHAEL VERARDO, ET AL.,	:	:	Dated: April 10, 2023
Plaintiffs,	:	:	New York, New York
	:	:	
-against-	:	:	
PROGRESSIVE CASUALTY INSURANCE	:	:	
COMPANY, ET AL.,	:	:	
Defendants.	:	:	
	X		


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

JOINT MOTION FOR EXTENSION OF TIME TO FILE PROPOSED NOTICE PLAN

The Parties file this Joint Motion for Extension of Time to File Proposed Notice Plan, and further state as follows.

1. On March 16, 2023, this Court granted class certification. Dkt. No. 208. In the Order, this Court directed the Parties to confer in fashioning a proposed Notice Plan, which was to be filed by April 7, 2023.
2. The Parties have been conferring on a proposed Notice Plan, including the language of the Notice forms, methods for disseminating Notice, and gathering the data necessary to identify Class Members and their contact information.

3. The Parties do not believe they will be able to conclude that process before the end of the day. As such, the Parties request a brief extension to next Friday, April 14, 2023, to file the proposed Notice Plan.
4. The request is not made for purposes of delay, but rather is made in good faith and based on just cause. The Parties anticipate that if the request is granted, they will be able to jointly agree on a proposed Notice Plan to present to the Court.
5. As such, the Parties respectfully submit the instant Motion should be granted.

Dated this April 7, 2023.

/s/ Hank Bates

Hank Bates (admitted *pro hac vice*)
Tiffany Oldham (admitted *pro hac vice*)
Lee Lowther (admitted *pro hac vice*)
CARNEY BATES & PULLIAM, PLLC
519 W. 7th Street
Little Rock, Arkansas 72201
Telephone: (501) 312-8500
Fax: (501) 312-8505
hbates@cbplaw.com
toldham@cbplaw.com
llowther@cbplaw.com

Thomas M. Mullaney (TM-4274)
THE LAW OFFICE OF THOMAS M.
MULLANEY
530 Fifth Avenue, 23rd Floor
New York, New York 10036
Telephone: 212-223-0800
Fax: (212) 661-9860
tmm@mullaw.org

Andrew J. Shamis (NY #5195185)
SHAMIS & GENTILE, P.A.
14 NE First Avenue, Suite 705
Miami, Florida 33132
Telephone: (305) 479-2299
ashamis@shamisgentile.com

Scott Edelsberg (admitted *pro hac vice*)

/s/ J. Matthew Brigman

J. Matthew Brigman (admitted *pro hac vice*)
Jeffrey S. Cashdan (admitted *pro hac vice*)
Zachary A. McEntyre (admitted *pro hac vice*)
Allison Hill White (admitted *pro hac vice*)
KING & SPALDING LLP
1180 Peachtree Street, N.E.
Atlanta, Georgia 30309
Telephone: (404) 572-4600
Fax: (404) 572-5100
mbrigman@kslaw.com
jcashdan@kslaw.com
zmcentyre@kslaw.com
awhite@kslaw.com

Julia C. Barrett (admitted *pro hac vice*)
KING & SPALDING LLP
500 W. 2nd Street
Austin, Texas 78701
Telephone: (512) 457-2000
Fax: (512) 457-2100
jbarrett@kslaw.com

Laura E. Harris
KING & SPALDING LLP
1185 Avenue of the Americas
34th Floor
New York, New York 10036-4003
Telephone: (212) 556-2100
Fax: (212) 556-2222

Christopher Gold (admitted *pro hac vice*)
EDELBERG LAW, PA
20900 NE 30th Avenue, Suite 417
Aventura, Florida 33180
Telephone: (305) 975-3320
scott@edelsberglaw.com
chris@edelsberglaw.com

lharris@kslaw.com

Counsel for Defendants

Jacob L. Phillips (admitted *pro hac vice*)
NORMAND PLLC
3165 McCrory Place, Suite 175
Orlando, FL 32803
Telephone: (407) 603-6031
jacob.phillips@normandpllc.com
ean@normandpllc.com

Counsel for Plaintiff and the Proposed Class

CERTIFICATE OF SERVICE

I certify that on April 7, 2023, I electronically transmitted the foregoing document with the Clerk of the Court using the CM/ECF system, which will provide electronic mail notice to all counsel of record.

/s/ Hank Bates

Hank Bates